

*United States Attorney  
Southern District of New York*

October 3, 2024

**BY ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re:** *United States v. Hubei Amarvel Biotech Co., Ltd. et al.*, S1 23 Cr. 302 (PGG)

Dear Judge Gardephe:

Earlier today, a grand jury returned Superseding Indictment S1 23 Cr. 303. (Dkt. 79). The only change to the original Indictment is, in Paragraph 41, the addition of “fentanyl-related substance” and a corresponding citation to 21 C.F.R. § 1308.11(h)(30)(i). Given the technical nature of this change, the Government respectfully proposes, with the consent of defendants Qingzhou Wang and Yiyi Chen, that the Court defer Wang and Chen’s arraignment on the Superseding Indictment until their next regular appearance before the Court.

Respectfully submitted,

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cc: All counsel of record